

**To:** Berry, Laura[berry.laura@epa.gov]; Patulski, Meg[patulski.meg@epa.gov]  
**Cc:** Dresser, Chris[Dresser.Chris@epa.gov]  
**From:** Russ, Timothy  
**Sent:** Thur 12/1/2016 3:38:20 PM  
**Subject:** FW: Information Transmittal from FHWA/CDOT: I-70 East Project PM Hot-spot Modeling Background Monitor

Hi Laura,

**Ex. 5 - Deliberative Process**

**Referred to FHWA**

**Ex. 5 - Deliberative Process**

"Mon 6/20/2016 2:56 PM

**Ex. 5 - Deliberative Process**

Hi Everyone,

**Ex. 5 - Deliberative Process**

# Ex. 5 - Deliberative Process

EPA's November, 2015 PM Hot-spot modeling guidance ("Transportation Conformity Guidance for Quantitative Hot-spot Analyses in PM<sub>2.5</sub> and PM<sub>10</sub> Nonattainment and Maintenance Areas") notes the following in section 9.3.4 *24-hour PM<sub>10</sub> NAAQS*:

## Calculating Design Values and Determining Conformity

The 24-hour PM<sub>10</sub> design value is calculated at each receptor by directly adding the sixth-highest modeled 24-hour concentrations (if using five years of meteorological data) to the appropriate monitor value for the 24-hour background concentration from three years of monitoring data, based on Exhibit 9-6.<sup>153</sup> Exhibit 9-6: Monitor Value Used for Design Value Calculation

Number of Background Concentration Values from the Monitor	Monitor Value Used for Design Value Calculation
< 347	Highest Monitor Value
348 -695	Second Highest Value
696 -1042	Third Highest Value
1043 -1096	Fourth Highest Value

PM<sub>10</sub> data from the Commerce City monitoring site is provided in the table below:

## EPA/OTAQ Table of Data

Year	N	Highest value	2 <sup>nd</sup> highest	3 <sup>rd</sup> highest	4 <sup>th</sup> highest
2013	357	144	97	93	89
2012	308	113	86	76	75
2011	351	82	65	64	61

“N” = the number of days of valid data recovery.

## Ex. 5 - Deliberative Process

## Ex. 5 - Deliberative Process

## Ex. 5 - Deliberative Process

Year	N	Highest value	2 <sup>nd</sup> highest	3 <sup>rd</sup> highest	4 <sup>th</sup> highest
2014	339	117	97	92	89
2013	357	144	97	93	89
2012	308	113	86	76	75

“N” = the number of days of valid data recovery.”

## Ex. 5 - Deliberative Process

Please let me know if you have any questions.

Thanks!

Tim

Tim Russ  
Environmental Scientist  
USEPA Region 8  
Air Program  
1595 Wynkoop Street (8P-AR)  
Denver, CO 80202-1129  
Ph. (303) 312-6479  
Fax (303) 312-6064  
e-mail: russ.tim@epa.gov

**From:** Berry, Laura  
**Sent:** Thursday, December 01, 2016 6:47 AM  
**To:** Russ, Timothy <Russ.Tim@epa.gov>; Patulski, Meg <patulski.meg@epa.gov>  
**Cc:** Dresser, Chris <Dresser.Chris@epa.gov>  
**Subject:** RE: Information Transmittal from FHWA/CDOT: I-70 East Project PM Hot-spot Modeling Background Monitor

So Tim, do we know what monitor value they're going to use for the background?

*Laura Berry*

(734) 214-4858

[berry.laura@epa.gov](mailto:berry.laura@epa.gov)

**From:** Russ, Timothy  
**Sent:** Wednesday, November 30, 2016 10:54 AM  
**To:** Berry, Laura <[berry.laura@epa.gov](mailto:berry.laura@epa.gov)>; Patulski, Meg <[patulski.meg@epa.gov](mailto:patulski.meg@epa.gov)>

**Cc:** Dresser, Chris <[Dresser.Chris@epa.gov](mailto:Dresser.Chris@epa.gov)>

**Subject:** Information Transmittal from FHWA/CDOT: I-70 East Project PM Hot-spot Modeling Background Monitor

Hi Everyone,

## Ex. 5 - Deliberative Process

Thanks!

Tim

Tim Russ  
Environmental Scientist  
USEPA Region 8  
Air Program  
1595 Wynkoop Street (8P-AR)  
Denver, CO 80202-1129  
Ph. (303) 312-6479  
Fax (303) 312-6064  
e-mail: [russ.tim@epa.gov](mailto:russ.tim@epa.gov)

**From:** Horn, Chris (FHWA) [<mailto:Chris.Horn@dot.gov>]

**Sent:** Wednesday, November 30, 2016 7:21 AM

**To:** Russ, Timothy <[Russ.Tim@epa.gov](mailto:Russ.Tim@epa.gov)>; Houk, Jeff (FHWA) <[Jeff.Houk@dot.gov](mailto:Jeff.Houk@dot.gov)>; Perritt, Karen (FHWA) <[Karen.Perritt@dot.gov](mailto:Karen.Perritt@dot.gov)>; Henderson - CDOT, Vanessa <[vanessa.henderson@state.co.us](mailto:vanessa.henderson@state.co.us)>

**Cc:** Jackson, Scott <[Jackson.Scott@epa.gov](mailto:Jackson.Scott@epa.gov)>; Patulski, Meg <[patulski.meg@epa.gov](mailto:patulski.meg@epa.gov)>; Berry, Laura <[berry.laura@epa.gov](mailto:berry.laura@epa.gov)>; Dresser, Chris <[Dresser.Chris@epa.gov](mailto:Dresser.Chris@epa.gov)>; Anderson, Carol <[Anderson.Carol@epa.gov](mailto:Anderson.Carol@epa.gov)>; Odendahl, Steve <[Odendahl.Steve@epa.gov](mailto:Odendahl.Steve@epa.gov)>; Dubey, Susmita <[dubey.susmita@epa.gov](mailto:dubey.susmita@epa.gov)>; Denawa, Mai <[Denawa.Mai@epa.gov](mailto:Denawa.Mai@epa.gov)>

**Subject:** RE: Information Transmittal to FHWA/CDOT: I-70 East Project PM Hot-spot

Modeling [WARNING: DKIM validation failed]

Tim,

As a follow up to your email dated 9/18/16 the project team has been consulting with CDPHE concerning the use of the La Casa air monitor. CDPHE has taken a hard look at the use of La Casa for us and they have concerns and issues with its use. Their primary issues, as extracted from the attached email, are:

1. La Casa is located on a little higher terrain outside of the Platte Valley, so wind flows related to sources can be different versus the Alsup/Commerce City site.
2. La Casa has little to no significant industrial activity nearby whereas the GES area does have nearby industrial activity, including Purina, Metro Denver Wastewater, Suncor Refinery and Xcel Cherokee. Alsup/Commerce City is downwind of these sources as well, so it better reflects the GES area.
3. The GES area has impacts from both I-25 and I-70, including the "mousetrap". Due to its topographically higher location to the west and wind patterns (see wind roses in our Annual Data Reports that show a predominant SW component) we do not believe that La Casa is fully picking up all the impacts from the existing highways.

# Referred to FHWA

I will address your second concern under a separate email.

Chris Horn, PE

Senior Area Engineer

Colorado Division

Federal Highway Administration

720-963-3017